

# **EXHIBIT SS**

Sonya Larson vs  
Dawn Dorland Perry, et al

Sonya C. Larson  
September 28, 2021

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS  
3 C.A. No. 1:19-CV-10203-IT

4 \* \* \* \* \*

5 SONYA LARSON,

6 Plaintiff,

7 vs.

8  
9 DAWN DORLAND PERRY, et al.,

10 Defendants.

11 \* \* \* \* \*

12 VOLUME II

13 DEPOSITION OF: SONYA C. LARSON

14 Conducted Remotely

15 11 Oxford Street

16 Malden, Massachusetts

17 Tuesday, September 28, 2021

11:11 a.m.

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1 Q. Okay. And in your second amended  
2 complaint, you allege that Dawn Dorland defamed you,  
3 correct?

4 A. Yes.

5 Q. Okay. So please tell me each instance in  
6 which you believe that Dawn Dorland defamed you.

7 MR. EPSTEIN: Objection.

8 A. I think that that is a difficult task.

9 Q. I am sure that it is, actually, but I still  
10 need you to answer the question.

11 A. Well, I believe that she called me a  
12 plagiarist to many people and organizations in my  
13 life.

14 Q. Okay. And so what is the first instance  
15 that you're aware of that you're referring to in  
16 your answer?

17 A. Could you clarify what you mean by "first."

18 Q. As far as you are aware of the allegation  
19 that you are bringing in this case concerning Dawn  
20 Dorland making defamatory statements, what is the  
21 first defamatory statement that you are aware of?

22 A. I don't believe you've answered my  
23 question. What do you mean by first?

24 Q. What's the first statement that you believe

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1 was made?

2 A. You mean chronologically?

3 Q. Sure. Let's go that way.

4 A. I have to try to recall.

5 Q. So just for -- for your purposes while  
6 you're trying to recall, the chronological order  
7 just for purposes of organizing your answer. If you  
8 mix up what was first and what was second, that's  
9 not, like, going to be an issue. So let's just go  
10 with what you remember as the first.

11 A. I believe that the first communication that  
12 she had with another person in which she said that I  
13 committed plagiarism and/or that I was a plagiarist  
14 was to the literary agent, Samantha Shea.

15 Q. And what precisely was the defamatory  
16 statement that you believe Ms. Dorland made to  
17 Samantha Shea?

18 MR. EPSTEIN: Objection.

19 A. I don't have that verbatim in my memory.

20 Q. So, as you sit here today, you do not know  
21 this aspect of your own claim?

22 MR. EPSTEIN: Objection.

23 A. No. That's not what I'm saying.

24 Q. So why don't you tell me what you can.

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1 what was the statement made to Samantha Shea upon  
2 which you base your allegation and claim for  
3 defamation?

4 A. Are you asking for the exact statement?

5 Q. No. I am asking for your view and your  
6 current knowledge on the basis of your claim that a  
7 defamatory statement was made to Samantha Shea.

8 A. I'm afraid I'm going to have to ask you to  
9 clarify the question.

10 Q. Okay. You testified that Dawn Dorland made  
11 a statement to Samantha Shea that you view as  
12 defamatory, correct?

13 MR. EPSTEIN: Objection.

14 A. I -- I mean, yes.

15 Q. Okay. And I'm asking you what that  
16 statement was.

17 A. But, again, I'm asking, do you want me to  
18 tell you that exact statement?

19 Q. Are you able to tell me that exact  
20 statement?

21 A. From memory, no.

22 Q. Okay. So why don't you answer on the  
23 record what you do remember.

24 A. I do remember that she contacted the

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1 literary agent, Samantha Shea, to say that I had  
2 committed plagiarism --

3 Q. when did --

4 A. -- and that she later, I believe, followed  
5 up with Samantha Shea to tell her more specifically  
6 about me specifically.

7 Q. And when did you first find out about that  
8 communication?

9 A. With Samantha Shea, I believe it was after  
10 a production of Dorland's documents in discovery.

11 Q. So you were not aware of Ms. Dorland's  
12 communications with Samantha Shea at the time that  
13 you filed your complaint, is that correct?

14 A. Yes.

15 Q. And what is the next statement that you are  
16 alleging to be defamatory in this matter?

17 A. By next what do you mean?

18 Q. So we seem to be going at these  
19 chronologically at your option; so the next  
20 chronological statement that was made that you're  
21 alleging to be defamatory.

22 A. Chronologically, I don't -- I don't know in  
23 my exact memory the order in which Dorland contacted  
24 people regarding myself, but all around the same

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1 time one of those included American Short Fiction.

2 Q. Okay. And what is the defamatory statement  
3 or statements that you are claiming that Dawn  
4 Dorland made to American Short Fiction?

5 A. Again, I'm going to need you to clarify.  
6 I -- I do not understand whether you are seeking me  
7 to tell you precisely the statement that she gave  
8 or -- or what exactly.

9 Q. Well, I'm asking you for as precise of  
10 information you have. I mean, this is a deposition.  
11 Any answer that you have you can give. If it's not  
12 precise, then give me your summary or what you do  
13 know as you sit here today.

14 A. I believe that she contacted American Short  
15 Fiction to say that my short story, "The Kindest,"  
16 had plagiarized her.

17 Q. And was that on one occasion?

18 A. I don't remember. I believe it was more  
19 than one, and that she made phone calls to them as  
20 well.

21 Q. And what was said in the phone calls that  
22 you are aware of that forms the basis of your  
23 defamation claim in this matter?

24 A. That she continued to say that my short

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1 story, "The kindest," had plagiarized her.

2 Q. And how did you learn of those phone  
3 calls -- or, actually, strike that.

4 were you a party to those phone calls?

5 A. No.

6 Q. Okay. So how did you learn of those phone  
7 calls?

8 A. The editors of American Short Fiction told  
9 me about them.

10 Q. And, according to your testimony, the  
11 defamation that was conveyed to American Short  
12 Fiction was that you plagiarized Dawn Dorland, is  
13 that correct?

14 A. That's my understanding.

15 Q. So was there anything else to that  
16 statement that you're aware of that -- that forms  
17 the basis of your defamation claim?

18 A. I don't understand the question. Could  
19 you --

20 Q. So all you've said is that she said that  
21 you plagiarized her. Is there anything else to that  
22 statement that you recall as you sit here today that  
23 you are alleging as defamatory?

24 MR. EPSTEIN: Objection.

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1 that you're alleging to be defamatory by Dawn  
2 Dorland. Can you please tell me what statement  
3 after the VSC contact you're claiming as part of  
4 your complaint in this matter concerning defamation.

5 MR. EPSTEIN: Objection.

6 A. She contacted the association of literary  
7 scholars, critics and writers. I may not have that  
8 exact term correct, but it was another literary  
9 organization that had funded a fellowship that I had  
10 received.

11 Q. And do you know when that contact took  
12 place?

13 A. I believe around the same time that she had  
14 contacted these other organizations.

15 Q. And what defamatory statement do you allege  
16 was conveyed in that contact?

17 A. I don't know what precise statements were  
18 made, but I believe from Dorland's own responses to  
19 the interrogatories, they were regarding a claim of  
20 plagiarism against me.

21 Q. Okay. And what was the next statement that  
22 you allege was made by Dawn Dorland that you're  
23 claiming as defamation?

24 A. She also contacted The Boston Globe to make

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1 a claim of plagiarism against me.

2 Q. And The Boston Globe ultimately published  
3 two articles concerning your story, "The Kindest,"  
4 correct?

5 A. Yes.

6 Q. Were there any defamatory statements, as  
7 you understood them, in those articles?

8 A. Yes.

9 Q. Okay. What were they?

10 A. That my short story, "The Kindest," had  
11 plagiarized Dawn Dorland.

12 Q. Other than what was printed in The Globe,  
13 are you claiming any other statements that  
14 Ms. Dorland may have made to The Globe as allegedly  
15 defamation?

16 MR. EPSTEIN: Objection.

17 A. I'm not sure. She said a lot to The Globe.

18 Q. Other than what's in the articles, what  
19 knowledge do you have concerning what Dawn Dorland  
20 said to The Globe?

21 MR. EPSTEIN: Objection.

22 A. I have all of the emails that she sent to  
23 them. She -- yeah. I have all the emails she sent  
24 to them.

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1 memory is that she repeatedly told them that I had  
2 committed plagiarism against her.

3 Q. Okay. And after The Globe, what was the  
4 next statement that you're claiming to be  
5 defamatory?

6 A. She also contacted my employer, Grub  
7 Street, and made the claim that my short story, "The  
8 kindest" had committed plagiarism against her.

9 Q. Were there any other statements made to  
10 Grub Street, other than a claim of plagiarism that  
11 you are claiming as defamatory?

12 MR. EPSTEIN: Objection.

13 A. I mean, I'm not sure. She made statements  
14 about me that were false, but I -- but I don't have  
15 those in mind regarding this legal action.

16 Q. Does that mean that you're not including  
17 those in your claim?

18 MR. EPSTEIN: Objection.

19 A. I don't know what you mean exactly.

20 Q. I'm asking you what defamatory statements  
21 that you believe were made by Dawn Dorland that form  
22 the basis of your claim in this litigation?

23 A. I understand.

24 Q. Yeah. And you then testified that you

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1 Ms. Dorland made defamatory statements?

2 A. Yes.

3 Q. And what entities are those?

4 A. The Bread Loaf Writers' conference is one.

5 Q. Okay. And what false statements do you  
6 allege that Ms. Dorland made to the Bread Loaf  
7 Writers' conference?

8 A. She suggested that I had applied for and  
9 received a fellowship to the Bread -- Bread Loaf  
10 Writers' conference using plagiarized material.

11 Q. When you say, "she suggested," what do you  
12 mean by that?

13 A. I mean that she spoke -- that she said that  
14 there was plagiarism in the short story, "The  
15 kindest," and that the author of that short story  
16 had received -- applied for and received a  
17 fellowship to the Bread Loaf Writers' conference and  
18 that she continually emailed and called Bread Loaf  
19 to reassert her claim.

20 Q. And how did you find out about these  
21 communications?

22 A. I learned about them when Jennifer Groats  
23 contacted me.

24 Q. And when did she contact you?

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1           A. Emails that Ms. Dorland had sent various  
2 staff members of Bread Loaf.

3           Q. And in those emails, did Ms. Dorland  
4 reference you by name?

5           A. I don't remember, but she did reference my  
6 short story by name. I do know that.

7           Q. Are there any other entities with which you  
8 claim that Ms. Dorland communicated any false  
9 statements concerning you?

10          A. Yes.

11          Q. And what entity? What is one of them?

12          A. The reporter, Kat Rosenfeld.

13          Q. And who is Kat Rosenfeld?

14          A. I don't know, aside from the fact that she  
15 is a writer and a reporter.

16          Q. And what statements do you allege were made  
17 by Ms. Dorland to Kat Rosenfeld?

18          A. I don't have them in front of me; so if  
19 you're looking for the exact statement, I don't have  
20 that photographic --

21          Q. I didn't --

22          A. I know, but I'm telling you the answer to  
23 your question. But I know that she was, once again,  
24 claiming that my short story had plagiarized her,

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1 and in my memory, she included a link to one of the  
2 Boston Globe articles which, of course, names me and  
3 names my story, and she was urging Ms. Rosenfeld to  
4 write about this.

5 Q. And when did --

6 MR. EPSTEIN: Suzanne, before you go on,  
7 my -- my computer froze for a second.

8 MS. ELOVECKY: Okay.

9 MR. EPSTEIN: The last -- the last I heard  
10 was Kat Rosenfeld and she was a writer and reporter.  
11 That's the last thing I heard.

12 Perhaps, Valerie if you could read from the  
13 record, I'll have the benefit of what I missed. I'm  
14 sorry to interrupt. I just --

15 MS. ELOVECKY: No. That's fine. We did  
16 didn't notice that you had frozen.

17 MR. EPSTEIN: Yeah. I did.

18 MS. ELOVECKY: Sorry.

19 MR. EPSTEIN: That's all right.

20 THE REPORTER: "Answer: I know, but I'm  
21 telling you the answer to your question. But I know  
22 that she was, once again, claiming that my short  
23 story had plagiarized her, and in my memory, she  
24 included a link to one of the Boston Globe articles

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1 starts, as you see, at the top of the page with an  
2 email to Christopher -- I mean -- I'm sorry -- from  
3 Christopher Castellani. Do you agree with me that's  
4 what we're looking at at the top of the page?

5 A. Yes.

6 Q. And the second email which is the one I'd  
7 like you to focus on is an email from  
8 eve@grubstreet.org, correct?

9 A. Yes.

10 Q. And that's Eve Bridberg, correct?

11 A. Uh-huh.

12 Q. From this production, we don't see whether  
13 anyone else is on this email chain, correct?

14 A. Yes.

15 Q. Were you on this email chain?

16 A. No.

17 Q. Okay. You see that in the email from Eve  
18 Bridberg she stated as the second sentence, "Do you  
19 have a sense of whether she'll own up to her own  
20 laziness?" Did I read that correctly?

21 A. Yes.

22 Q. Prior to seeing this email today, had you  
23 seen this email previously?

24 A. No.

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1 Q. Had Eve Bridberg ever shared with you that  
2 she held a view that you had acted with laziness?

3 A. No.

4 Q. She -- then the next question -- I was  
5 going to call it a sentence, but it is a question --  
6 is (as read) "Or to over, dash, borrowing in early  
7 drafts?" Do you see that?

8 A. Yes.

9 Q. Had Ms. Bridberg ever spoken to you  
10 concerning any view that she may have held that you,  
11 quote, over-borrowed, in early drafts?

12 A. I don't remember.

13 Q. And that's not something that would stick  
14 out in your memory?

15 A. I mean, that's a hypothetical question. I  
16 don't know how to answer it.

17 Q. Has anyone ever told you that you  
18 over-borrowed from Dawn Dorland's letter?

19 A. Do you mean did they use that phrase?

20 Q. First, yes.

21 A. Not to my memory.

22 Q. Has anyone ever used any other phrase  
23 suggesting that you improperly utilized Dawn  
24 Dorland's letter on being broad on her --

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1 Q. But, specifically, the letter within your  
2 story, is it your testimony that you don't know when  
3 or why you made changes to that letter?

4 A. Are you speaking about a specific time  
5 frame?

6 Q. The one we're talking about here in between  
7 your note from your friend and the publication with  
8 American Short Fiction.

9 A. I absolutely made changes to my story. I  
10 know that because the editors of American Short  
11 Fiction and I corresponded about many changes that  
12 they wanted me to make and that I wanted to make to  
13 my short story but --

14 Q. My question was --

15 A. I'm answering your question. But I can't  
16 tell you from memory right now whether those many  
17 revisions that we went over included revisions to  
18 the letter portion of my short story.

19 Q. Okay. So I'm just going to summarize the  
20 list again just to help make sure that we're on the  
21 same page and that we get a complete answer. Okay?

22 A. Okay.

23 Q. So thus far in response to my question as  
24 to which people or entities Ms. Dorland made what

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1 you allege to be defamatory statements, you have  
2 responded, Samantha Shea, American Short Fiction --  
3 there's more -- Grub Street, Bread Loaf, Kat  
4 Rosenfeld, and the literary scholar entity, Vermont  
5 Studio Center, and Boston Globe, correct?

6 A. Yes.

7 Q. Are there any other individuals or entities  
8 that you claim Ms. Dorland made a statement that was  
9 false?

10 MR. EPSTEIN: I just want to object. I'm  
11 not sure your list is fully complete, but I think  
12 the record will reflect the completeness.

13 A. Yes. So this is difficult for me because  
14 you're asking me to do this entirely from memory; so  
15 I want to state that on the record. But, again,  
16 from memory, I believe that she also contacted  
17 someone named Samantha Hunt.

18 Q. And what was the statement made to Ms. Hunt  
19 that you claim to be defamatory?

20 A. Again, this would be so much easier if you  
21 could present these documents in front of all of us  
22 here to be able to look at them ourselves, but  
23 again, if you're asking me entirely from memory, I  
24 believe that she contacted Samantha Hunt with her

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(Document marked as Exhibit 24  
for identification)

BY MS. ELOVECKY:

Q. You should have Exhibit 24 on your screen.

A. Yup.

Q. And this is the article titled, (as read)  
"Inspiration or Plagiarism, question mark. Writing  
hackles raised in Boston dispute," and it's dated  
July 26, 2018, correct?

A. Correct.

Q. Now, if you turn to Page 8 of Exhibit 23,  
it's where the comments begin. I endeavored to  
expand all of the comments, although some of them  
break across a page in a way I could not avoid. I  
would just like you to review for me these comments  
and identify for me anything that you see as  
reflecting harm that you've suffered to your  
reputation.

A. I just want to say it's a little hard for  
me to do this because there are comments here that  
have replies that are not expanded. There are also  
comments that have been blocked, it appears, that  
were at one point not blocked.

Q. Can you show me an example of where the

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1 of comments on this article, you've identified two  
2 comments, plus one word from a third comment which  
3 you see as potentially harmful to your reputation,  
4 correct?

5 MR. EPSTEIN: Objection.

6 Q. I'll restate that because I did -- let  
7 me -- let me just restate that.

8 You view two comments, plus one word from  
9 one third comment that you view as depicting damage  
10 to your reputation?

11 MR. EPSTEIN: Objection.

12 A. I would say they are reflective of damage  
13 to my reputation.

14 Q. Other than the comments to -- well, let me  
15 show you the second article first.

16 (Document marked as Exhibit 26  
17 for identification)

18 BY MS. ELOVECKY:

19 Q. Okay. I'm now showing you what's been  
20 marked as Exhibit 26. This is a Boston Globe  
21 article dated article August 13th, 2018, and the  
22 title is "Boston Book Festival cancels One City One  
23 Story event amid plagiarism flap." Did I read that  
24 correctly?

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1 A. Yes.

2 Q. Okay. And if you turn to Page 4, at the  
3 bottom of the page, do you see first that the  
4 article reflects that there are only two comments to  
5 this article, correct?

6 A. Yes.

7 Q. And do either of these two comments which  
8 bridge Pages 4 and 5 of this exhibit reflect any  
9 expression from the commenters that you view as  
10 demonstrating any harm to your reputation?

11 A. I'm not sure. I'd have to speak with my  
12 attorney.

13 Q. Well, I'm asking you about your view. I'm  
14 not asking you about your attorney's view. I'm not  
15 asking about a legal -- I'm not -- there's no legal  
16 question. I'm asking you what you view these  
17 comments as.

18 A. Sure. These are comments that reflect what  
19 I presume are an untold number of readers of this  
20 article who came away with an impression of me as a  
21 plagiarist, and as we know, this article is the  
22 direct result of Ms. Dorland contacting The Boston  
23 Globe in an effort to get this article published.

24 Q. Other than -- strike that.

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1 A. Oh, okay. Yes, I did.

2 Q. Okay. And did you review correspondence  
3 between yourself and Sarah Green?

4 A. I don't remember. If there was  
5 correspondence, then, yes.

6 Q. You have claims against Dawn Dorland for  
7 intentional interference with advantageous  
8 relationships, don't you?

9 A. Yes.

10 Q. Okay. And what is your understanding as to  
11 what interference Dawn Dorland had with American  
12 Short Fiction?

13 MR. EPSTEIN: Objection.

14 A. I'm not a legal scholar, but my  
15 understanding of that concept is that -- actually,  
16 could you rephrase the question. I'm trying to  
17 remember exactly what it was.

18 Q. What interference did Dawn Dorland enact  
19 between yourself and American Short Fiction?

20 MR. EPSTEIN: Objection.

21 A. Again, I'm not a legal scholar, but my  
22 layperson's understanding of that concept applies as  
23 such, which is that Ms. Dorland raised the specter  
24 of legal action and litigation against American

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1 from the ASF website, was there any other result  
2 which you see as flowing from Dawn Dorland's  
3 communications with ASF?

4 MR. EPSTEIN: Objection.

5 A. I'm sorry. I'm going to have to have you  
6 repeat the question one more time. Any more result,  
7 is that the -- the words you used?

8 Q. So it's your -- it's your opinion that  
9 because of Dawn Dorland's statements to ASF, they  
10 removed the story from the website, correct?

11 A. Yes.

12 Q. Was there any other effect -- let's use  
13 that word -- of Dawn Dorland's statements to ASF  
14 that you're aware of?

15 A. As it relates to ASF?

16 Q. Yes, as it relates to your claim for  
17 intentional interference with your relationship with  
18 ASF.

19 A. No.

20 Q. Okay. So how about the BBF; you claim that  
21 Dawn Dorland interfered with your advantageous  
22 relationship with the BBF, correct?

23 A. Yes.

24 Q. And how did she do so?

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1 MR. EPSTEIN: Objection.

2 A. No. I wouldn't say they sought my  
3 acquiescence.

4 (Document marked as Exhibit 30  
5 for identification)

6 BY MS. ELOVECKY:

7 Q. So I'm showing you what's been marked as  
8 Exhibit 30. It's an email from you to Rebecca --  
9 Rebecca Markovits dated April 25th, 2018. Do you  
10 see that?

11 A. Yes.

12 Q. And about halfway down the page there's an  
13 entry in the chain that's dated June 24th, 2018, at  
14 5:48 p.m. where you state, (as read) "Hello again,  
15 Rebecca, I hope you're having a great weekend. Go  
16 ahead and sunset my piece, dash, you can remove it  
17 now, if you'd like." Did I read that sentence  
18 correctly?

19 A. Yes.

20 Q. So you did email ASF and told them that  
21 you -- well, you told them exactly what you wrote,  
22 which is, "Go ahead and sunset my piece - you can  
23 remove it now, if you'd like," correct?

24 A. I did.

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1 Q. So, in this email chain in the third entry,  
2 Christopher Castellani states, "The only way this  
3 Chunks cliffhanger works is if DD is the victim...."  
4 I'm pausing there. DD stands for Dawn Dorland,  
5 correct?

6 A. I believe so.

7 Q. And then he goes on to say, (as read)  
8 "...tumbling down the stairs Big Little Lies style,  
9 period." Did I read that correct?

10 A. Yes.

11 Q. And you're stating that you're not aware  
12 that, when the character in Big Little Lies was  
13 pushed down the stairs, that he died?

14 MR. EPSTEIN: You didn't ask that question.  
15 Object.

16 A. I've never seen Big Little Lies. I -- I  
17 don't know who's in it. I don't know what happens  
18 in it. I don't know.

19 Q. Was it at all concerning to you that your  
20 friends were joking about pushing Dawn Dorland down  
21 the stairs Big Little Lies style?

22 MR. EPSTEIN: Objection.

23 A. This line of questioning is very strange.

24 Are you familiar with the nature of what it

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1 quite is responding to your question the way that  
2 you're seeking it from me, but yes.

3 (Document marked as Exhibit 32  
4 for identification)

5 BY MS. ELOVECKY:

6 Q. But you didn't say -- strike that. It's  
7 fine. We'll leave the dodge on this record.

8 So I have now shown you what's been marked  
9 as Exhibit 32. This is an email chain between you  
10 and your writing group, and the top email in the  
11 chain is dated July 28th of 2018. Do you see that?

12 A. Yes.

13 Q. And if you turn to Page 3.

14 A. Yes.

15 Q. In approximately in the middle of the page,  
16 Whitney Scharer states, "I will never be able to  
17 unsee this photo of DFD." Did I read that  
18 correctly?

19 A. Yes.

20 Q. What does DFD refer to?

21 A. I believe it refers to Dawn fucking  
22 Dorland.

23 Q. And your group used that acronym for  
24 Ms. Dorland pretty consistently throughout the

Sonya Larson vs  
Dawn Dorland Perry, et al

Sonya C. Larson  
September 28, 2021

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1 COMMONWEALTH OF MASSACHUSETTS )

2 SUFFOLK, SS. )

3 I, Valerie Rae Johnston, Shorthand Reporter and  
4 Notary Public in and for the Commonwealth of  
5 Massachusetts, do hereby certify that there came  
6 before me on the 28th day of September 2021, at  
7 11:11 a.m., the person hereinbefore named, who was  
8 by me duly sworn to testify to the truth and nothing  
9 but the truth of her knowledge touching and  
10 concerning the matters in controversy in the cause;  
11 that she was thereupon examined upon her oath, and  
12 her examination reduced to typewriting under my  
13 direction; and that the deposition is a true record  
14 of the testimony given by the witness.

15 I further certify that I am neither attorney or  
16 counsel for, nor related to or employed by, any  
17 attorney or counsel employed by the parties hereto  
18 or financially interested in the action.

19 In witness whereof, I have hereunto set my hand  
20 and affixed my notarial seal this \_\_\_\_ day of  
21 October 2021.

22 \_\_\_\_\_  
23 Notary Public

24 My commission expires: 8/5/22